

ID: CCA-921549-08

Number: **200851090**

Office:

Release Date: 12/19/2008

UILC: 6231.00-00

From:

Sent: Tue 9/2/2008 3:49 PM

To:

Cc:

Subject: RE: Guaranteed debt as basis a TEFRA item?

You are covered by the Form 872-P. Under [Dakota Hills v. Commissioner](#), the note guarantee (and the resulting allocation of debt) are partnership items affecting the taxability of the distribution.